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*Counsel for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION

WESTERN WATERSHEDS PROJECT  
al.,

Plaintiffs,

vs.

RANDY MOORE, in his official capacity  
as Chief of the U.S. Forest Service, et al.,

Federal-Defendants.

Case No. 9:22-cv-00149-DLC-  
KLD

**DECLARATION OF ADAM  
BRONSTEIN**

Pursuant to 28 U. S. C. § 1746, I, Adam Bronstein, declare under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen and I make this declaration based on my own personal knowledge.
2. I currently reside in Sisters, Oregon and have been a resident here since 2014. I grew up in Syracuse, New York. I am a member of and an employee of Plaintiff, Western Watersheds Project, a conservation non-profit based in Hailey, Idaho and a plaintiff in this case. I have been working for Western Watersheds Project since 2020. First, as the Idaho Director, and currently as the Oregon/Nevada Director.
3. I have visited the Greater Yellowstone Ecosystem (GYE) at least once a year for the past 23 years. My trips generally extend between 2-3 three weeks at a time where I travel to different areas of the Ecosystem. I spend the majority of my time visiting roadless areas and Wilderness areas. I camp during the entirety of my trips, either out of my truck or out of a tent. I have lived in Pinedale, Wyoming and Jackson, Wyoming. Both of these places are located within the GYE.
4. I am drawn back to the Greater Yellowstone Ecosystem every year due to its remarkable biodiversity and because it represents one of the largest nearly

intact temperate-zone ecosystems on Earth. The GYE affords me the opportunity to experience the wonders of wildness unlike anywhere else in the lower 48 states.

5. The Northern Greater Yellowstone Ecosystem and the Paradise Valley, in particular, is a place that I visit regularly when I travel to the GYE. I spend most of my time between the Gallatin Range to the West and the Absaroka-Beartooth Wilderness to the East. I enjoy visiting the front range of the Absaroka-Beartooths, both in and near the grazing allotments at issue in this litigation. I am drawn back to this area on a regular basis due to its natural beauty, wildness, and wildlife.

6. I have physically set foot on the Suce Creek Allotment, Mill Creek Allotment, Sixmile South Allotment, and the Sixmile North Allotment. I have never visited the Elbow Allotment, but I have enjoyed the views and glassed for wildlife many times looking into the Elbow Creek drainage.

7. My first trip to the area was September, 2009 where I attended a friend's wedding at Chico Hot Springs. I spent additional time in the area exploring and camping up Mill Creek.

8. My last trip to the area was August, 2023. I spent time up Mill Creek, where I hiked and camped up the East Fork.

9. Over the past fourteen years, I have visited the area on roughly ten separate trips.

10. I plan to return to the area over Summer 2024.

11. I am drawn back to the eastern Paradise Valley every year due to its remarkable biodiversity. I appreciate that this area is a critical component of the GYE, one of the largest nearly intact temperate-zone ecosystems on Earth. The vast majority of native ecosystems have been degraded to a point beyond recognition. The federal lands of the eastern Paradise Valley still allows one to experience the wonders of wildness.

12. This area is a well of spiritual renewal for me because it is home to the full complement of species present at the time of the Lewis and Clark expedition including grizzly bears, wolves, wolverine, bison, elk and cutthroat trout, and because it contains vast acreages of wildlands and wilderness areas that provide habitat for these species. Being in the presence of these species, particularly the grizzly bear, has great significance to me personally.

13. Grizzly bears play a pivotal role in the health and vitality of the area. The presence of grizzly bears is indicative of robust, functioning wildlands. Their existence ensures the continuation of natural processes that have shaped these landscapes over millennia.

14. Encountering grizzly bears (from a safe viewing distance) in their natural habitat profoundly enhances my outdoor experience. One of the reasons

why I visit the eastern front of the Range is to get the chance to view grizzly bears. These magnificent creatures, with their sheer size and presence, instill in me a deep sense of humility. The experience of sharing the landscape with grizzlies is both exhilarating and humbling.

15. The Forest Service's decision to authorize continued and expanded grazing in the East Paradise allotments harms my interests in the area and my interests in grizzly bears and grizzly bear conservation. I believe the decision poses a significant threat to the grizzly bear population here because this use disrupts their natural habitat and food sources. This encroachment leads to increased conflicts between bears and humans, as bears are drawn to livestock as an alternative food source when they displace native ungulates, a natural food source. Unfortunately, these encounters frequently result in the lethal management of bears, further endangering their already vulnerable populations, harming and diminishing my ability to share the landscape with them.

16. The East Paradise decision will also likely displace native ungulates and other mammals (grizzly food) due to competition for limited resources. Livestock tend to consume large amounts of vegetation, reducing the availability of food for native species and sometimes altering the plant composition of the area.

Additionally, the presence of livestock disrupts the natural movement and migration patterns of ungulates, forcing them to relocate to less optimal habitats for survival.

17. In addition to wildlife watching, I also enjoy hiking (on and off trail) and angling in the area. The presence of livestock would diminish my experience because they trample and destroy stream banks, defecate in water ways, negatively impacting water quality, among other issues.

18. The East Paradise project area is a well of spiritual renewal for me. I return to the front range of the Absaroka-Beartooth Wilderness again and again because unlike most places on our system of national public lands, this place is relatively wild and intact. When experiencing and immersing myself in the wilderness found here, I feel connected to something larger than myself.

19. I believe the East Paradise decision challenged in this case would greatly harm grizzly bears and other native wildlife that I enjoy experiencing in this location. The wildlife that are present here, particularly the grizzly bear, makes this place special to me. Continued and expanded livestock grazing would diminish my experience and cause irreparable harm to me personally. I also believe that if the Forest Service had carefully considered and analyzed the effects of its East Paradise decision on grizzly bears and made a fully informed decision (as required by NEPA),

that it would likely have made a different decision and likely considered closing all six allotments.

20. An order from this court reversing the decision to continue and expand livestock grazing on these allotments and directing the Forest Service to take a hard look at the effects of the East Paradise decision – as required by NEPA - would remedy harm caused to me.

Executed in Sisters, Oregon this 6th day of December, 2023.



ADAM BRONSTEIN